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ADMITTED ONLY IN OHIO

Paradise Products Corp. v. Sable & Rosenfeld Foods, Ltd. Re:

08 Civ. 0069 (RBS)(AJP)

Dear Judge Sand:

Pursuant to the Court's direction during the conference held in Chambers on May 7, 2008, counsel for both parties respectfully submit this joint letter setting forth the following proposed schedule for further proceedings in this case:

July 9, 2008 initial disclosures exchanged pursuant to Rule 26(a)(1)

July 11, 2008 parties to serve any document requests or interrogatories

August 11, 2008 responses to document requests and interrogatories

**September 19, 2008** completion of fact discovery

September 26, 2008 exchange of expert reports

October 27, 2008 expert response to expert reports



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November 28, 2008 expert discovery concluded

**December 5, 2008** deadline for dispositive motions

The parties do not request any alterations to the limitations on depositions contained in the Federal Rules.

This letter is written jointly on behalf of both parties and reflects the agreement of both parties. If the Court requires anything further, feel free to contact us.

Respectfully submitted,

Jeffrey H. Daichman

Franked,

cc: Susan I. Robbins, Esq. (by fax)

MEMO ENDORSED